

1 Joseph R. Saveri (State Bar No. 130064)  
Andrew M. Purdy (State Bar No. 261912)  
2 Matthew S. Weiler (State Bar No. 236052)  
James G. Dallal (State Bar No. 277826)  
3 Ryan J. McEwan (State Bar No. 285595)  
JOSEPH SAVERI LAW FIRM, INC.  
4 505 Montgomery Street, Suite 625  
San Francisco, California 94111  
5 Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
6 Email: jsaveri@saverilawfirm.com  
apurdy@saverilawfirm.com  
7 jdallal@saverilawfirm.com  
mweiler@saverilawfirm.com  
8 rmcewan@saverilawfirm.com

9 *Interim Lead Class Counsel for Direct Purchaser Plaintiffs*

10  
11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13

14 IN RE CAPACITORS ANTITRUST LITIGATION

Master File No. 3:14-cv-03264-JD

15 THIS DOCUMENT RELATES TO  
16 ALL ACTIONS

**DECLARATION OF JOSEPH R. SAVERI  
IN SUPPORT OF DIRECT PURCHASER  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF THE FIRST AMENDED  
CONSOLIDATED COMPLAINT**

1 I, Joseph R. Saveri, declare:

2 1. I am an attorney licensed in the State of California and admitted to practice in the  
3 Northern District of California. I am the founder of the Joseph Saveri Law Firm, Inc. ("JSLF"). I serve  
4 as Interim Lead Class Counsel for the Direct Purchaser Plaintiffs in this action. I have personal  
5 knowledge of the facts set forth herein and, if called as a witness, could and would testify competently  
6 to them.

7 2. This declaration is made in support of Direct Purchaser Plaintiffs' Administrative  
8 Motion to Seal portions of Paragraphs 194, 206, 212-213, 215-217, 230, 237-257, 261, 263, 265, 271-273,  
9 278-280, 282-283, 290, 292, 294, 299-304, 306, and 359 of their First Amended Consolidated Complaint.

10 3. The basis for sealing the identified portions of the First Amended Complaint is that  
11 certain Defendants designed documents referenced or relied upon in the First Amended Complaint as  
12 "Confidential" or "Highly Confidential" under the Protective Order.

13 4. The Protective Order in this matter (Dkt. No. 563), which was agreed to by Plaintiffs,  
14 requires that documents designed "Confidential" or "Highly Confidential" be filed under seal.

15 5. Pursuant to Civ. L.R. 79-5(e), Plaintiffs identify all of the portions of Amended  
16 Complaint they seek to seal.

17 6. Attached hereto as **Exhibit 1** is a chart identifying the paragraphs of the Amended  
18 Complaint that Plaintiffs seek to file under seal.

19 7. With respect to each section so identified, Plaintiffs take no position on whether the  
20 material is "privileged, protectable as a trade secret or otherwise entitled to protection under law"  
21 pursuant to Civ. L.R. 79-5 or on whether the strong presumption of access to judicial records may be  
22 rebutted under the good cause or compelling reasons standards.

23 6. Plaintiffs take no position on whether the Administrative Motion should be granted.

24 I declare under penalty of perjury under the laws of the United States and the State of California  
25 that the foregoing is true and correct and to the best of my knowledge and that this declaration was  
26 executed in San Francisco, California on June 16, 2015.

27  
28 By: /s/ Joseph R. Saveri  
Joseph R. Saveri